UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MELISSA HARTMAN, on behalf of herself and all those similarly situated,

Civil Case Number: 2:15-cv-01364-CB

Plaintiffs,

NOTICE OF MOTION FOR THE PRO HAC VICE ADMISSION OF YITZCHAK ZELMAN, ESQ.

-against-

MONARCH RECOVERY MANAGEMENT, INC., and JOHN **DOES 1-10**

Defendants.

PLEASE TAKE NOTICE that on ______, 2017, or as soon thereafter as counsel may be heard, the undersigned attorney for Plaintiff Melissa Hartman, in the above captioned matter will move this Court for an Order admitting Yitzchak Zelman, Esq. of the law firm Marcus & Zelman, LLC at 1500 Allaire Avenue, Suite 101, Ocean, New Jersey 07712, pro hac vice pursuant to Local Civil Rule 83.2 B as counsel for Plaintiff Melissa Hartman in connection with all proceedings in this matter.

PLEASE TAKE FURTHER NOTICE that, in support of this application, the undersigned shall rely on the Certifications of Yitzchak Zelman, Esq., being filed and served herewith.

PLEASE TAKE FURTER NOTICE that, a proposed form of Order is submitted herewith.

Dated: January 25, 2017

/s/ Mark Moynihan

Mark G. Moynihan Esq. **MOYNIHAN LAW** 112 Washington Place, Suite 1-N

Telephone: (412) 889-8535 Facsimile: (800) 997-8192

/s/ Yitzchak Zelman

Pittsburgh, PA 15219

Yitzchak Zelman, Esq.
Attorney I.D. #YZ5857
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ATTORNEYS FOR PLAINTIFF

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CERTIFICATION OF SERVICE

I, Mark Moynihan, hereby certify that on December 14, 2016, I electronically filed

the attached Notice of Motion for the Admission of Yitzchak Zelman, Esq., Pro Hac Vice

and accompanying papers with the Clerk of the Court by using the Court's CM/ECF

system, and accordingly served all parties who receive notice of the filing via the Court's

CM/ECF system.

Dated: December 14, 2016

/s/ Mark Moynihan

Mark G. Moynihan Esq.

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